

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region III
Environmental Science Center
701 Mapes Road
Fort Meade, MD 20755

October 24, 2007

CONFIDENTIAL
ATTORNEY-CLIENT
PRIVILEGE

MEMORANDUM

SUBJECT: NPDES Compliance Evaluation Inspection

FROM: Joe Reyna III OECEJ (3EC10)
Environmental Scientist, Fort Meade Office

THRU: Paul Dressel OECEJ (3EC10)
Chief, Enforcement and Compliance Assistance Branch

TO: Angela McFadden WPD (3WP31)
Chief, NPDES Branch

Attached you will find a copy of the Compliance Evaluation Inspection report for Potomac Electric Power Company Benning Road Generating Station inspection conducted on August 24, 2007.

Summary of Findings:

1. On the date of the inspection, an oil spill (<5 gallons) was observed near outfall #401.
2. 8 out of the 11 members of the pollution prevention team had not received their annual storm water pollution prevention training.
3. PEPCO's NPDES Permit (DC0000094) was issued to the facility on November 17, 2000 and expired on November 16, 2005. The facility has submitted their permit renewal application, and they are awaiting their new permit.

Should you have any questions regarding the attached report, please feel free to contact this office at (410) 305-2779.



United States Environmental Protection Agency
Washington, D.C. 20460

Water Compliance Inspection Report

Form Approved
OMB No.
2040-0057
Approval
Expires 8-
31-98

SECTION A: NATIONAL DATA SYSTEM CODING (i.e., PCS)

Transaction	Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac
1 <u>N</u>	2 <u>5</u>	3 <u>DC0000094</u>	12 <u>07/08/24</u>	18 <u>C</u>	19 <u>J</u>	20 <u>2</u>
21 _____				Remarks 66		
Inspection Work Days		Facility Self-Monitoring Evaluation Rating		B1	QA	Reserved
67 _____	69 _____	70 _____	71 _____	72 _____	73 _____	74 _____
80 _____						

SECTION B: FACILITY DATA

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number)

PEPCO
Benning Road Generating Station
3400 Benning Road
Washington, DC 20019

Entry Time/Date

0930 / 8-24-07

Permit Effective Date

11/17/00

Exit Time/Date

1530 / 8-24-07

Permit Expiration
Date

11/16/05

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)
Fafiba Mahvi/Senior Engineer/202-331-6641

Other Facility Data

Name, Address of Responsible Official/Title/Phone and Fax Number
S. A. Wisniewski/ VP Operations/202-372-2301
@ PEPCO Hqs;701 Ninth Street, NW; Washington, DC 20068

Contacted

Yes ☒ No

SECTION C: AREAS EVALUATED DURING INSPECTION (Check only those areas evaluated)

<input checked="" type="checkbox"/> Permit	<input checked="" type="checkbox"/> Flow Measurement	<input type="checkbox"/> Operations & Maintenance	<input type="checkbox"/> CSO/SSO (Sewer Overflow)
<input checked="" type="checkbox"/> Records/Reports	<input checked="" type="checkbox"/> Self Monitoring Program	<input type="checkbox"/> Sludge Handling & Disposal	
<input type="checkbox"/> Facility Site Review	<input type="checkbox"/> Pollution Prevention	<input type="checkbox"/> Pretreatment	
	<input type="checkbox"/> Compliance Schedules	<input type="checkbox"/> Multimedia	
<input type="checkbox"/> Effluent/Receiving Waters Other:	<input checked="" type="checkbox"/> Laboratory	<input checked="" type="checkbox"/> Storm Water	

SECTION D: SUMMARY OF FINDINGS/COMMENTS (Attach additional sheets of narrative and checklists as necessary)

Name(s) and Signature(s) of Inspector(s)

Agency/Office/Phone and (Fax) Numbers

Date

Joe Reyna III

EPA/OECEJ-FIP/410-305-2779 (-3093)

3/24/07

Signature of Management Q A Reviewer
Date

Agency/Office/Phone and Fax Numbers

NPDES Compliance Evaluation Inspection

Potomac Electric Power Company (PEPCO)
Benning Road Generating Station
3400 Benning Road, NE, Washington, D.C. 20019
NPDES No. DC0000094

Inspection: August 24, 2007
Joe Reyna III- OECEJ (3EC10)
Final Report-

OCT 30 2007

A handwritten signature in black ink, appearing to be 'J. Reyna III', is written over the date stamp.



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Remarks						
21 _____ 66						
Inspection Work Days Facility Self-Monitoring Evaluation Rating B1 QA -----Reserved-----						
67 _____	69 _____	70 _____	71 _____	72 _____	73 _____	74 _____
80 _____						

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S. A. Wisniewski/ VP Operations/202-372-2301
@ PEPCO Hqs;701 Ninth Street, NW; Washington, DC 20068

Contacted

Yes ☒ No

SECTION C: AREAS EVALUATED DURING INSPECTION (Check only those areas evaluated)

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<input type="checkbox"/> Facility Site Review	<input type="checkbox"/> Pollution Prevention		
<input type="checkbox"/> Compliance Schedules	<input type="checkbox"/> Pretreatment		
<input type="checkbox"/> Multimedia			
<input type="checkbox"/> Effluent/Receiving Waters	<input checked="" type="checkbox"/> Laboratory	<input checked="" type="checkbox"/> Storm Water	
Other:			

SECTION D: SUMMARY OF FINDINGS/COMMENTS (Attach additional sheets of narrative and checklists as necessary)

Name(s) and Signature(s) of Inspector(s)

Agency/Office/Phone and (Fax) Numbers

Date

Joe Reyna III

EPA/OECEJ-FIP/410-305-2779 (-3093)

8/24/07

Signature of Management Q A Reviewer
Date

Agency/Office/Phone and Fax Numbers

**NPDES Compliance Evaluation Inspection
Potomac Electric Power Company
Benning Road Generating Station
NPDES No. DC0000094
Inspection Summary**

Introduction

On August 24, 2007, a NPDES CEI Inspection was conducted to evaluate the wastewater monitoring practices of Potomac Electric Power Company, Benning Road Generating Station, 3400 Benning Road, NE, Washington, D.C. 20019 (PEPCO). EPA inspectors reviewed records, interviewed personnel, conducted an inspection tour of the facility, and completed a NPDES 3560 Inspection Checklist. PEPCO, North American Energy Services, and DC Department of the Environment employees participated in the entrance conference. A sign-in sheet was passed around the conference table, and the names and phone numbers of all participants is attached to this report. Credentials were presented to facility personnel, upon entry.

Permit Status

PEPCO's NPDES Permit (DC0000094) was issued to the facility on November 17, 2000 and expired on November 16, 2005. The facility has submitted their permit renewal application, and they are awaiting their new permit. The facility is currently operating under their expired permit parameters and conditions.

Facility Description

PEPCO consists of a generating station, a 230 kV switchyard, a 69 kV switchyard, fleet services, office and security services, transmission and distribution shops, transformer repair and testing shop, storage buildings, several parking areas, a hazardous waste/PCB handling storage facility, hazardous waste accumulation trailer, asbestos trailer, subsidiary and contractor facilities, and various outdoor storage areas. The facility is located on approximately 77 acres of land adjacent to the Anacostia River. The generating station is owned by Potomac Power Resources (PPR) [a wholly owned subsidiary of Pepco Energy Services (PES).] The generating station is comprised of two oil-fired steam generators each with a rated output of 275 megawatts. There are also two oil-fired package boilers for auxiliary and building services.

North American Energy Services (NAES) operates and maintains the Benning Rd. Generating Station for PEPCO. NAES maintains a staff of 23 that maintain/operate the generating station 24/7, with a minimum of 2 personnel per shift. The facility was not generating electricity, on the date of the inspection. The Benning Rd. Generating Station primarily generates electricity during the peak winter and summer seasons when demand is high. According to PEPCO staff, the facility is in full operation for approximately 30-35 days per year. The facility uses No. 2 fuel oil to start-up the plant, then, switches to No. 4 fuel oil for sustained operation. The facility stores approximately 4.2 million gallons of fuel on-site and maintains a SPCC plan.

Stormwater runoff from PEPCO is conveyed through a drain system and is discharged to the Anacostia River and city storm sewers at various outfalls. The majority of the storm water runoff from the service center is conveyed through a 36-inch to 54-inch storm drainpipe to the Anacostia River via Outfall 013 (see photographs 1-2).

There is a variety of permitted, process wastewater flows at PEPCO. These are included in the NPDES Permit. The majority of these flows are discharged to the Anacostia River via Outfall 013. The permitted discharges consist of: non-contact cooling water, cooling tower blowdown, oil/water separators, cooling tower basin wash water, stormwater, cooling water from boiler feed pumps, demineralization, regeneration wastes, groundwater infiltration sump water, fireside washing, and miscellaneous cleaning waste, and water for hydrostatic tank testing.

On-Site Inspection

During the on-site inspection, several of the facility's outfalls were observed, as well as, the facility's in-house lab. A full listing of the facility's outfalls, with each outfall's location and monitoring requirements, is attached to this report.

The facility's in-house lab is used to monitor effluent samples for chlorine residual and pH. The facility's other effluent samples are shipped off-site to Gascoyne Laboratories, Inc. for analysis. The facility utilizes a GE Infrastructure Water and Process Technologies pH Meter. A review of the facility's calibration log book indicated the facility has been calibrating the instrument using a 3 point calibration before use, and the pH buffers were not expired.

After the lab was observed, outfall #013 was observed. Outfall #013 is the facility's largest outfall that discharges a combined waste stream of wastewater and stormwater. More specifically, outfall #013 discharges wastewater from 2 oil/water separators, non-contact cooling water, cooling tower blowdown, basin cleaning wastes from two cooling towers, and stormwater from several locations within the facility. The outfall drains into the Anacostia River. On the date of the inspection, non-contact cooling water was observed exiting the outfall. The effluent was fairly clear with no visible floating solids or foam. The outfall appeared to be in good condition, on the date of the inspection (see photographs 1-2).

Since effluent was observed exiting outfall #013, the inspection team decided to capture a grab sample at monitoring point 201. Monitoring point 201 is an internal monitoring point that monitors the facility's industrial wastewater before it commingles with stormwater (after the waste streams commingle the effluent exits outfall #013). The grab sample was taken at approximately 12:25pm. The pH was 8.03 with a temperature of 28.6 degrees Celsius and was within permit parameters.

Outfalls #003, 416, 010, 402, and 401 were also observed during the on-site inspection. A description of the outfalls is attached to this report. The outfalls appeared to be in good condition, on the date of the inspection. However, an oil spill was observed near outfall #401. The type of oil or the cause of the spill was not known, at the time of the

inspection. The spill appeared to be <5 gallons of oil. The oil had soaked into the soil and was several feet up gradient from the stormwater outfall. Facility staff immediately called a clean-up crew to remediate the oil spill. Due to the size of the spill, there was no immediate danger to human health or the environment. The facility did have hay bails surrounding the nearest outfall (see photographs #3 & 5).

Records Review

Discharge Monitoring Reports (DMR) and the facility's Stormwater Pollution Prevention Plan were reviewed as part of the inspection. The June 2007 DMR was reviewed along with all the supporting lab analysis and flow data used to generate the report. The DMR and supporting data appeared to be adequate, and there were no effluent violations reported for the period reviewed.

Upon review of the facility's Stormwater Pollution Prevention Plan, it was observed that a copy of the facility's Annual Site Compliance Evaluation and a list of PEPCO employees who received their annual stormwater pollution prevention training were not included in the plan. PEPCO staff stated that the documents requested were available electronically but had not yet been printed out and included in the plan. PEPCO staff stated they would mail a copy of the requested information. On September 04, 2007, Mr. Joe Reyna received, via certified mail, a copy of the requested information. The 2006 Annual Site Compliance Evaluation appeared to meet with permit parameters; however, the list of PEPCO employees who received the annual stormwater pollution prevention training failed to include 8 out of the 11 members of the pollution prevention team (see attachment).

Attachment(s):

Inspection Report & NPDES 3560 Checklist

Inspection Photographs

Sign-in Sheet

A list of PEPCO's Stormwater Pollution Prevention Team

A list of PEPCO's Outfalls and Monitoring Points

Correspondence from PEPCO regarding the 2006 Site Compliance Evaluation & a list of PEPCO employees who received the annual stormwater pollution prevention training.

SECTIONS F THRU L: COMPLETE ON ALL INSPECTIONS, AS APPROPRIATE. N/A = NOT APPLICABLE		PERMIT NO.: DC0000094
SECTION F – FACILITY AND PERMIT BACKGROUND		
ADDRESS OF PERMITTEE IF DIFFERENT FROM FACILITY (Including City, County and ZIP code) Potomac Electric Power Company 701 Ninth Street, NW Washington, DC 20068	DATE OF LAST PREVIOUS INVESTIGATION BY EPA/STATE 02/23/2005 USEPA FINDINGS 3 unpermitted stormwater drains were identified.	
SECTION G – RECORDS AND REPORTS		
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT. <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A (Further explanation attached _____) DETAILS:		
(a) ADEQUATE RECORDS MAINTAINED OF:		
(i) SAMPLING DATE, TIME, EXACT LOCATION	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	
(ii) ANALYSES DATES, TIMES	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	
(iii) INDIVIDUAL PERFORMING ANALYSIS	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	
(iv) ANALYTICAL METHODS/TECHNIQUES USED	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	
(v) ANALYTICAL RESULTS (e.g., consistent with self-monitoring report data)	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	
(b) MONITORING RECORDS (e.g., flow, pH, D.O., etc.) MAINTAINED FOR A MINIMUM OF THREE YEARS INCLUDING ALL ORIGINAL STRIP CHART RECORDINGS (e.g., continuous monitoring instrumentation, calibration and maintenance records).		
		<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
(c) LAB EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS KEPT. On-site		
		<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
(d) FACILITY OPERATING RECORDS KEPT INCLUDING LOGS FOR EACH TREATMENT UNIT. Oil/water separators		
		<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
(e) QUALITY ASSURANCE RECORDS KEPT.		
		<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
(f) RECORDS MAINTAINED OF MAJOR CONTRIBUTING INDUSTRIES (and their compliance status) USING PUBLICLY OWNED TREATMENT WORKS.		
		<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
SECTION H – PERMIT VERIFICATION		
INSPECTION OBSERVATIONS VERIFY THE PERMIT. <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A (Further explanation attached _____) DETAILS: Unpermitted stormwater drains were included in newest permit application renewal.		
(a) CORRECT NAME AND MAILING ADDRESS OF PERMITTEE.		
		<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
(b) FACILITY IS AS DESCRIBED IN PERMIT.		
		<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
(c) PRINCIPAL PRODUCT(S) AND PRODUCTION RATES CONFORM WITH THOSE SET FORTH IN PERMIT APPLICATION.		
		<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
(d) TREATMENT PROCESSES ARE AS DESCRIBED IN PERMIT APPLICATION. Oil/Water Separator		
		<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
(e) NOTIFICATION GIVEN TO EPA/STATE OF NEW, DIFFERENT OR INCREASED DISCHARGES		
		<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
(f) ACCURATE RECORDS OF RAW WATER VOLUME MAINTAINED.		
		<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
(g) NUMBER AND LOCATION OF DISCHARGE POINTS ARE AS DESCRIBED IN PERMIT.		
		<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
(h) CORRECT NAME AND LOCATION OF RECEIVING WATERS. Anacostia River		
		<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
(i) ALL DISCHARGES ARE PERMITTED.		
		<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Comments: The facility's contract lab was not inspected. The facility's lab monitors for chlorine residual and pH. All other samples are sent to a contract lab.		

SECTION I – OPERATION AND MAINTENANCE

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED. X YES _ NO _ N/A (Further explanation attached _____)
 DETAILS: Oil/ water separators

(a) STANDBY POWER OR OTHER EQUIVALENT PROVISIONS PROVIDED. X YES _ NO _ N/A

(b) ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE. X YES _ NO _ N/A

(c) REPORTS ON ALTERNATE SOURCE OF POWER SENT TO EPA/STATE AS REQUIRED BY PERMIT. _ YES _ NO X N/A

(d) SLUDGES AND SOLIDS ADEQUATELY DISPOSED. X YES _ NO _ N/A

(e) ALL TREATMENT UNITS IN SERVICE. X YES _ NO _ N/A

(f) CONSULTING ENGINEER RETAINED OR AVAILABLE FOR CONSULTATION ON OPERATION AND MAINTENANCE PROBLEMS. X YES _ NO _ N/A

(g) QUALIFIED OPERATING STAFF PROVIDED. The only treatment units are oil/water separators. _ YES _ NO X N/A

(h) ESTABLISHED PROCEDURES AVAILABLE FOR TRAINING NEW OPERATORS. _ YES _ NO X N/A

(i) FILES MAINTAINED ON SPARE PARTS INVENTORY, MAJOR EQUIPMENT SPECIFICATIONS, AND PARTS AND EQUIPMENT SUPPLIERS. X YES _ NO _ N/A

(j) INSTRUCTIONS FILES KEPT FOR OPERATION AND MAINTENANCE OF EACH ITEM OF MAJOR EQUIPMENT. X YES _ NO _ N/A

(k) OPERATION AND MAINTENANCE MANUAL MAINTAINED. X YES _ NO _ N/A

(l) SPCC PLAN AVAILABLE. X YES _ NO _ N/A

(m) REGULATORY AGENCY NOTIFIED OF BY-PASSING. (Dates _____) _ YES _ NO X N/A

(n) ANY BY-PASSING SINCE LAST INSPECTION. _ YES _ NO X N/A

(o) ANY HYDRAULIC AND/OR ORGANIC OVERLOADS EXPERIENCED. _ YES _ NO X N/A

SECTION J – COMPLIANCE SCHEDULES

PERMITTEE IS MEETING COMPLIANCE SCHEDULE.

☐ YES ☐ NO ☒ N/A (Further explanation attached _____)

CHECK APPROPRIATE PHASE(S):

- ☐ (a) THE PERMITTEE HAS OBTAINED THE NECESSARY APPROVALS FROM THE APPROPRIATE AUTHORITIES TO BEGIN CONSTRUCTION.
- ☐ (b) PROPER ARRANGEMENT HAS BEEN MADE FOR FINANCING (mortgage commitments, grants, etc.).
- ☐ (c) CONTRACTS FOR ENGINEERING SERVICES HAVE BEEN EXECUTED.
- ☐ (d) DESIGN PLANS AND SPECIFICATIONS HAVE BEEN COMPLETED.
- ☐ (e) CONSTRUCTION HAS COMMENCED.
- ☐ (f) CONSTRUCTION AND/OR EQUIPMENT ACQUISITION IS ON SCHEDULE.
- ☐ (g) CONSTRUCTION HAS BEEN COMPLETED.
- ☐ (h) START-UP HAS COMMENCED.
- ☐ (i) THE PERMITTEE HAS REQUESTED AN EXTENSION OF TIME.

Comments:

	PERMIT NO.DC0000094
SECTION K – SELF-MONITORING PROGRAM	
PART 1 – FLOW MEASUREMENT (Further explanation attached _____)	
PERMITTEE FLOW MEASUREMENT MEETS THE REQUIREMENTS AND INTENT OF THE PERMIT. DETAILS:	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
(a) PRIMARY MEASURING DEVICE PROPERLY INSTALLED.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
TYPE OF DEVICE <input type="checkbox"/> WEIR <input type="checkbox"/> PARSHALL FLUME <input type="checkbox"/> MAGMETER <input type="checkbox"/> VENTURI METER <input type="checkbox"/> OTHER (Specify _____)	
(b) CALIBRATION FREQUENCY ADEQUATE. (Date of last calibration _____)	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
(c) PRIMARY FLOW MEASURING DEVICE PROPERLY OPERATED AND MAINTAINED.	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
(d) SECONDARY INSTRUMENTS (totalizers, recorders, etc.) PROPERLY OPERATED AND MAINTAINED.	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
(e) FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGES OF FLOW RATES.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
PART 2 – SAMPLING (Further explanation attached _____)	
PERMITTEE SAMPLING MEETS THE REQUIREMENTS AND INTENT OF THE PERMIT. DETAILS: No composite samples are taken. All samples collected are grab samples.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
(a) LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
(b) PARAMETERS AND SAMPLING FREQUENCY AGREE WITH PERMIT.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
(c) PERMITTEE IS USING METHOD OF SAMPLE COLLECTION REQUIRED BY PERMIT. <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A IF NO, <input type="checkbox"/> GRAB <input type="checkbox"/> MANUAL COMPOSITE <input type="checkbox"/> AUTOMATIC COMPOSITE <input checked="" type="checkbox"/> FREQUENCY <u>Weekly & Monthly & Quarterly depending on outfall.</u>	
(d) SAMPLE COLLECTION PROCEDURES ARE ADEQUATE.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
(i) SAMPLES REFRIGERATED DURING COMPOSITING	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
(ii) PROPER PRESERVATION TECHNIQUES USED	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
(iii) FLOW PROPORTIONED SAMPLES OBTAINED WHERE REQUIRED BY PERMIT	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
(iv) SAMPLE HOLDING TIMES PRIOR TO ANALYSES IN CONFORMANCE WITH 40 CFR 136.3	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
(e) MONITORING AND ANALYSES BEING PERFORMED MORE FREQUENTLY THAN REQUIRED BY PERMIT. Occasionally	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
(f) IF (e) IS YES, RESULTS ARE REPORTED IN PERMITTEE'S SELF-MONITORING REPORT.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A

PART 3 – LABORATORY (Further explanation attached _____)
 PERMITTEE LABORATORY PROCEDURES MEET THE REQUIREMENTS AND INTENT OF THE PERMIT. X YES _ NO _ N/A
 DETAILS: The facility performs pH, and Cl2 on-site. The facility's contract lab was not inspected.

(a) EPA APPROVED ANALYTICAL TESTING PROCEDURES USED. (40 CFR 136.3) X YES _ NO _ N/A

(b) IF ALTERNATE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED. _ YES _ NO X N/A

(c) PARAMETERS OTHER THAN THOSE REQUIRED BY THE PERMIT ARE ANALYZED. _ YES X NO _ N/A

(d) SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT. Maintained on-site. X YES _ NO _ N/A

(e) QUALITY CONTROL PROCEDURES USED. X YES _ NO _ N/A

(f) DUPLICATE SAMPLES ARE ANALYZED 10 & 5 % OF TIME. X YES _ NO _ N/A
 10% for TSS and 5% for oil and grease samples.

(g) SPIKED SAMPLES ARE USED 10 % OF TIME. X YES _ NO _ N/A

(h) COMMERCIAL LABORATORY USED. X YES _ NO _ N/A

(i) COMMERCIAL LABORATORY STATE CERTIFIED. _ YES _ NO X N/A

LAB NAME Gascoyne Laboratories, Inc.

LAB ADDRESS 2101 Van Dusen Street, Baltimore, Maryland 21224, Telephone: 410-633-1800

Comments:

EPA FORM 3560-3

PAGE 4 OF 5

						PERMIT NO. DC0000094	
SECTION L – EFFLUENT/RECEIVING WATER OBSERVATIONS (Further explanation attached <u>See photograph #1.</u>)							
OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	VISIBLE FLOAT SOLIDS	COLOR	OTHER
013	none	none	mild	none	none	straw	

(Sections M and N: Complete as appropriate for sampling inspections)

SECTION M – SAMPLING INSPECTION PROCEDURES AND OBSERVATIONS (Further explanation attached _____)

☐ GRAB SAMPLES OBTAINED

☐ COMPOSITE OBTAINED NA

☐ FLOW PROPORTIONED SAMPLE

☐ AUTOMATIC SAMPLER USED

☐ SAMPLE SPLIT WITH PERMITTEE

☐ CHAIN OF CUSTODY EMPLOYED

☐ SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE

COMPOSITING FREQUENCY _____ PRESERVATION _____

SAMPLE REFRIGERATED DURING COMPOSITING: ☐ YES ☐ NO

SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE _____

SECTION N – ANALYTICAL RESULTS (Attach report if necessary)

NA

